



NOVEMBER 7, 1996

MR. G. LANDON DAVIDSON  
N.C.D.E.H.N.R.  
GROUNDWATER SECTION  
MOORESVILLE REGIONAL OFFICE  
919 NORTH MAIN STREET  
MOORESVILLE, N.C. 28115

N.C. DEPT. OF  
ENVIRONMENT, HEALTH,  
& NATURAL RESOURCES

NOV 9 1996

DIVISION OF ENVIRONMENTAL  
MOORESVILLE REGIONAL OFFICE

RE: REVIEW OF SITE SOIL AND GROUNDWATER INVESTIGATION REPORT  
REEVES BROTHERS - OSAGE PLANT, GASTON COUNTY, N.C.

DEAR MR. DAVIDSON:

ON BEHALF OF REEVES BROTHERS, INC., MAX JUSTICE AND MYSELF WOULD LIKE TO THANK YOU FOR SEEING US AND PROVIDING US ASSISTANCE IN BRINGING THIS PROJECT TO A CLOSE. ATTACHED ARE THE DOCUMENTS YOU REQUESTED:

APPENDIX C-TEST BORING RECORDS/HAND AUGER BORING SUMMARIES  
-PHASE II SURVEY  
-OSAGE PLANT  
APPENDIX D-LABORATORY REPORTS  
-PHASE II SURVEY  
-OSAGE PLANT

YOU ALSO REQUESTED SOME INFORMATION ON:

BIS(2-ETHYLHEXYL)PHTHALATE  
n-BUTYLBENZENE

I HAVE INCLUDED A LETTER FROM "ROGERS &u CALLCOTT" WHICH DISCUSSES THE PRESENCE OF BIS(2-ETHYLHEXYL)PHTHALATE AS A LABORATORY CONTAMINANT. THIS LETTER IS TITLED; "QUALITY CONTROL DATA QUALIFIER". I AM SURE THAT AFTER YOU HAVE REVIEWED THIS DOCUMENT YOU WILL AGREE THAT IT IS NO LONGER AN ISSUE.

WITH RESPECT TO THE PRESENCE OF n-BUTYLBENZENE I HAVE INCLUDED A COPY OF TABLE 8 (FROM THE S&ME REPORT) AND A WELL LOCATION MAP (ALSO FROM THE S&ME REPORT). THE DOCUMENTS INDICATE THAT THE PRESENCE OF n-

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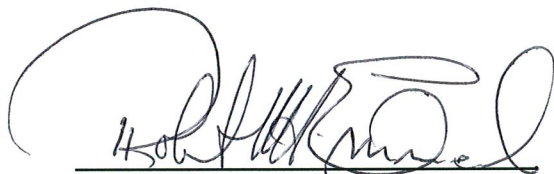
BUTYLBENZENE WAS ONLY AT THE "BC1-5" SITE. THE DIRECTLY UP-DIP SITES ("BC2-5" AND "BC13-12") DID NOT CONTAIN n-BUTYLBENZENE (AT EITHER 5 FEET OR 12 FEET RESPECTIVELY). THIS INFORMATION SUPPORTS THE CONCLUSION THAT THE ORGANIC SPECIES IS RELATED TO THE PRESENCE OF THE FUEL OIL. JUST AS ONE OFTEN FINDS THE PRESENCE OF BENZENE, TOLUENE, ETHYLBENZENE AND XYLENE WITH GASOLINE ONE ALSO FINDS THE PRESENCE OF n-BUTYLBENZENE WITH FUEL OILS.

ADDITIONALLY, FOR REASONS OF COMPLETENESS AND AT YOUR REQUEST, I AM INCLUDING THIS LAST COMMENT. I TOOK THE OPPORTUNITY TO CONSULT WITH SEVERAL OF MY COLLEAGUES VIA MY ASSOCIATION WITH BEING THE NATIONAL CHAIR ON AIR WITH ATMI. VIA THESE DISCUSSIONS I FOUND THAT NEITHER OF THESE CHEMICALS ARE GENERALLY USED AT PLANTS ASSOCIATED WITH "GREIGE" OPERATIONS-NOR WERE THEY USED AT OUR OSAGE PLANT.

AGAIN, ON BEHALF OF REEVES BROTHERS, INC. I WOULD LIKE TO THANK YOU FOR YOUR ASSISTANCE. SHOULD YOU HAVE ANY QUESTIONS, PLEASE DON'T HESITATE TO CONTACT ME AT 864/595-2140.

SINCERELY,

REEVES BROTHERS, INC.

A handwritten signature in black ink, appearing to read "Robert H. Emmel", written over a horizontal line.

ROBERT H. EMMEL, Ph.D  
CORPORATE CHIEF ENVIRONMENTALIST